November 24, 2003

Mr. Tom Antenucci
BP Indianapolis Terminal
2500 North Tibbs Avenue
Indianapolis, IN 46222

Re: First Significant Permit Revision SPR097-18167-00076 to FESOP No.: F097-15203-00076

Dear Mr. Antenucci:

BP Indianapolis Terminal was issued a FESOP renewal on August 13, 2003 for a gasoline distribution source. A letter requesting changes to this permit was received on September 16, 2003. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of removal of the HAP limits and in the corresponding record keeping and reporting requirements. The source has throughput limits that limit both VOC and HAPs. Therefore, record keeping and reporting relating to throughput are sufficient to demonstrate that VOC and HAP emissions are less than major levels. In addition, Condition B.10 was removed and new language was added to the permit cover page. A number of corrections to wording and Condition references in Section D.1 were also made.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Amanda Hennessy at (317) 327-2510.

Sincerely,

Original Signed by John B. Chavez

John B. Chavez
Administrator

Enclosure: Revised Permit Pages
Technical Support Document

cc: U.S. EPA, Region V
Mindy Hahn, IDEM OAQ
Air Compliance - Matt Mosier
Air Permits - Amanda Hennessy
Files

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES

BP Indianapolis Terminal
2500 N. Tibbs Avenue
Indianapolis, IN 46222

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-15203-00076	
Issued by: Original signed by John B. Chavez John B. Chavez, Administrator	Issuance Date: August 13, 2003 Expiration Date: August 13, 2008

First Significant Permit Revision: SPR097-18167-00076	Pages affected: 1, 3, 4, 26, 28, 29, 30, 38 and 39
Issued by: Original Signed by John B. Chavez John B. Chavez Administrator Office of Environmental Services	Issuance Date: November 24, 2003

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 FACILITY OPERATION CONDITIONS: One (1) Loading Rack

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 VOC and HAP FESOP Limit [326 IAC 2-8-4] [326 IAC 12][40 CFR Part 60. 500, Subpart XX]

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]

D.1.3 Gasoline Transports [326 IAC 8-4-7]

D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-4-9]

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Determination Requirements

D.1.6 VOC and HAPs

D.1.7 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Carbon Adsorber

D.1.9 Leak Inspection

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

D.1.11 Reporting Requirements

SECTION D.2 FACILITY OPERATION CONDITIONS: Storage tanks for petroleum products

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds [326 IAC 8-4-3]

D.2.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.3 Monitoring

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.4 Record Keeping Requirements

SECTION D.3 FACILITY OPERATION CONDITIONS: Insignificant emitting activities

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2]

D.3.2 Volatile Organic Compounds (VOC) 326 IAC 8-3-5(a)

D.3.3 Particular Emission Limitations for Sources of Indirect Heating (PM) [326 IAC 6-2-4]

Certification Form
Emergency Occurrence Form
Quarterly Report Form Gasoline throughput
Quarterly Deviation and Compliance Monitoring Report Form

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) loading rack for dispensing of petroleum product, with one (1) carbon adsorber, identified as V10, for control of volatile organic compounds. Loading rack installed in 1993.

(b) One (1) Garage used for tank truck vapor tightness testing operations

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 VOC and HAP FESOP Limit [326 IAC 2-8-4] [326 IAC 12][40 CFR Part 60. 500, Subpart XX]

(a) The VOC emissions from the vapor recovery unit on the Loading Rack shall be limited to 35 milligrams per liter of gasoline (0.292 lbs per 1000 gals) outlet concentration.

(b) The amount of gasoline and distillate oil product loaded at the Loading Rack are limited to less than 400,000,000 gallons per 12 consecutive month period and 270,000,000 gallons per 12 consecutive month period respectively. These throughput limitations are equivalent to 82 tons of VOC per 12 consecutive month period from the loading rack and VRU. These throughput limits satisfy the requirement to restrict VOC and HAP emissions below the Major Source Thresholds as defined in 326 IAC 2-7-1 such that 326 IAC 2-7 (Part 70 Operating Permit Regulation) will not apply.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-4-4]

Pursuant to 326 IAC 8-4-4 (Bulk gasoline terminals):

(a) No owner or operator of a bulk gasoline terminal shall permit the loading of gasoline into any transport, excluding railroad tank cars, or barges, unless:

(1) The bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation and consisting of one of the following:

(A) An adsorber or condensation system which processes and recovers vapors and gases from the equipment being controlled, releasing no more than 80 milligrams per liter of VOC to the atmosphere.

(B) A vapor collection system which directs all vapors to a fuel gas system or incinerator.

(C) An approved control system, demonstrated to have control efficiency equivalent to or greater than clause (A) above.

(2) Displaced vapors and gases are vented only to the vapor control system.

(3) A means is provided to prevent liquid drainage from the loading device when it is

signature, to ensure that gasoline transports loading at its facility comply with subsection (a).

(c) The owner or operator of a vapor balance system or vapor control system subject to this rule shall:

(1) design and operate the applicable system and the gasoline loading equipment in a manner that prevents:

(A) gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen (18) inches of H_2O) and a vacuum from exceeding one thousand five hundred (1,500) pascals (six (6) inches of H_2O) in the gasoline transport;

(B) except for sources subject to 40 CFR 60.503(b) (NESHAP/MACT) or 40 CFR 63. 425(a) (New Source Performance Standards) requirements, a reading equal to or greater than twenty-one thousand (21,000) parts per million as propane, from all points on the perimeter of a potential leak source when measured by the method referenced in 40 CFR 60, Appendix A, Method 21, or an equivalent procedure approved by the commissioner during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and

(C) avoidable visible liquid leaks during loading or unloading operations at gasoline dispensing facilities, bulk plants, and bulk terminals; and

(2) within fifteen (15) days, repair and retest a vapor balance, collection, or control system that exceeds the limits in subdivision (1).

(d) The department may, at any time, monitor a gasoline transport, vapor balance, or vapor control system to confirm continuing compliance with subsection (a) or (b).

(e) If the commissioner allows alternative test procedures in subsection (a)(1) or (c)(1)(B), such method shall be submitted to the U.S. EPA as a SIP revision.

(f) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in subsection (c)(1)(B). Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be as follows:

(1) Five hundred (500) parts per million methane for all bulk gas terminals subject to NESHAP/MACT (40 CFR 63, Subpart R).

(2) Ten thousand (10,000) parts per million methane for all bulk gas terminals subject to a New Source Performance Standard.

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.6 VOC and HAPs

In order to comply with Conditions D.1.1, and D.1.4, the carbon adsorber vapor recovery unit, for VOC and HAPs control shall be in operation and control emissions from the loading rack at all times gasoline is being loaded.

D.1.7 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

(a) To demonstrate compliance with Condition D.1.1(a), a compliance stack test shall be performed within a six (6) month period of issuance of this permit, and, thereafter, within five (5) years since the latest valid stack test of the carbon adsorber vapor recovery unit. This test shall be performed according to 40 CFR 60, Appendix A, Methods 25 and 25A.

(b) If the commissioner allows alternative test procedures in subsection (a)(1) or (c)(1)(B) of Condition D.1.4, such method shall be submitted to the U.S. EPA as a SIP revision.

(c) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in subsection (c)(1)(B) of Condition D.1.4. Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be as follows:

(1) Five hundred (500) parts per million methane for all bulk gas terminals subject to NESHAP/MACT (40 CFR 63, Subpart R).

(2) Ten thousand (10,000) parts per million methane for all bulk gas terminals subject to a New Source Performance Standard.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Carbon Adsorber

For the one (1) carbon adsorber, to document compliance with Condition D.1.4(c), the Permittee shall perform once per shift**,** whenever the processes being controlled are in operation, of the key operating parameters, including bed pressure and vacuum level, and document the findings. The Permittee may use a portable thermal incinerator as a back up to the carbon adsorber. When a back up portable thermal incinerator is in use, the Permittee must perform a daily check of the thermal incinerator temperature.

D. 1.9 Leak Inspection

Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.1(b), the Permittee shall maintain monthly records at the source of the volume in gallons of each fuel received, including purchase orders and invoices necessary to verify the type and amount used;

(b) To document compliance with D.1.4(f), the owner or operator of a vapor balance or vapor control system subject to this section shall maintain records of all compliance testing. The records shall identify the following:

(1) The vapor balance, vapor collection, or vapor control system.
(2) The date of the test and, if applicable, retest.
(3) The results of the test and, if applicable, retest.

The records shall be maintained in a legible, readily available condition for at least two (2) years after the date the testing and, if applicable, retesting were completed.

(c) To document compliance with Condition D.1.4(a), the owner or operator of a gasoline transport subject to this section shall keep a legible copy of the transport's most recent valid annual modified 40 CFR 60, Appendix A, Method 27 test either in the cab of the transport or affixed to the transport trailer. The test record shall identify the following:

(1) The gasoline transport.
(2) The type and date of the test and, if applicable, date of retest.
(3) The test methods, test data, and results certified as true, accurate, and in compliance with this rule by the person who performs the test.

This copy shall be made available immediately upon request to the department and to the owner of the loading facility for inspection and review. The department shall be allowed to make copies of the test results.

(d) To document compliance with Condition D.1.8, the Permittee shall maintain records of the following operation parameters of the carbon adsorber vapor recovery unit:

(1) bed pressure; and
(2) vacuum level.

(e) To document compliance with Condition D.1.8, the Permittee shall maintain records of the following operation parameters of the backup portable thermal incinerator when in use:

(1) dates when the portable terminal incinerator is in use; and
(2) a log of the daily check of the thermal incinerator temperature, on those dates.

(f) To document compliance with condition D.1.9, the Permittee shall maintain records of each monthly leak inspection required under Sec. 60.502(j) shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information: (1) Date of inspection. (2) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak). (3) Leak determination method. (4) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days). (5) Inspector name and signature.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the period being reported.

PAGE DELETED AND INTENTIONALLY LEFT BLANK

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES

FESOP Quarterly Report

Source Name: BP Oil Company
Source Address: 2500 North Tibbs Avenue, Indianapolis, Indiana 46222-0278
Mailing Address: P.O. Box 22278, Indianapolis, Indiana 46222
FESOP No.: F097-5563-00076

Facility: **Loading Rack**
Parameter: **Distillate Oil Throughput**
Limit: **270,000,000 gallons per 12 consecutive month period**

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	BP Indianapolis Terminal
Source Location:	2500 N Tibbs, Indianapolis Indiana 46222
County:	Marion
SIC Code:	5171
Operation Permit No.:	F097-15203-00076
Operation Permit Issuance Date:	August 13, 2003
Permit Revision No.:	F097-18167-00076
Permit Reviewer:	Amanda Hennessy

The Office of Air Quality (OAQ) and the Office of Environmental Services (OES) have reviewed a permit revision application from BP Indianapolis Terminal relating to the operation of a gasoline distribution source.

History

BP Indianapolis Terminal was issued a Federally Enforceable State Operating permit on August 13, 2003. On September 16, 2003, BP Indianapolis Terminal submitted an application to the OES requesting the removal of the HAP report forms. On October 6, 2003, BP Indianapolis Terminal submitted a letter requesting a name change.

Existing Approvals

The source was issued a Federally Enforceable State Operating Permit (F097-15203-00076) on August 13, 2003.

Enforcement Issue

There are no enforcement actions pending.

Justification

In FESOP F097-15203-00076, BP Indianapolis Terminal has a loading rack throughput limit which limits VOC emissions from the loading rack to less than 82 tons per year. This throughput limit also limits HAP emissions to less than 10 tons per year for a single HAP and to less than 25 tons per year for all HAPs combined. Therefore, the reporting form on page 40 of F097-15203-00076, which will be used to report gasoline throughput, and a new reporting form, which will be used to report distillate oil throughput, are sufficient to show compliance with both the VOC limit and the

HAP emission limits. Therefore, the HAP reporting forms on pages 38 and 39 of F097-15203-00076 and Condition D.1.1(c) which limits HAP emissions are not necessary. Condition D.1.1(b) will be amended to state that the throughput limit limits both VOC and HAPs such that 326 IAC 2-7 is not applicable. In addition, the correlating record keeping condition, D.1.11(e) (D.1.11 is now D.1.10) is not necessary. The throughput recordkeeping requirement in (a) is sufficient to show compliance.

The documents submitted to change the source name are sufficient to demonstrate legal ownership change. The name in the permit was changed when the renewal was issued on August 13, 2003. So, no changes in the permit are necessary.

The source has also asked that a number of administrative corrections in Section D.1 be made. The corrections made are:

(a) A number of references to other conditions in Section D.1 have been corrected and / or made more specific.
(b) Condition D.1.3 was the same as Condition D.1.8, therefore Condition D.1.8 was deleted.
(c) The term certification testing was changed to compliance testing and the word monthly was added to clarify that fuel throughput records must be kept monthly.
(d) Conditions D.1.11(d) and (i) (D.1.11 is now D.1.10) were redundant so they were removed.

The changes described above result in the removal of reporting. Therefore, this request is being processed as a significant permit revision. Pursuant to 326 IAC 2-8-11.1(f), changes that cannot be made as an administrative amendment or under 326 IAC 2-8-11.5(d), are significant permit revisions.

Recommendation

The staff recommends to the Commissioner that the Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 16, 2003. Additional information was received on October 6, 2003.

Emission Calculations

No change in potential, limited, or actual emissions has occurred. Therefore, no calculations were necessary for this permit revision.

Limited Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	
PM-10	
SO_2	
VOC	less than 100
CO	
NO_x	

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
any single HAP	less than 10
TOTAL	less than 25

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ and OES emission data.

Pollutant	Actual Emissions (tons/year)
PM	NR
PM-10	NR
SO_2	NR
VOC	18.65
CO	NR
NO_x	NR
HAP (specify)	NR

NR = none reported

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO_2	maintenance attainment
NO_2	maintenance attainment
Ozone	attainment
CO	attainment
Lead	unclassifiable

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

No changes in federal rule applicability have occurred due to this request.

State Rule Applicability - Entire Source

No changes in state applicability for the entire source have occurred due to this request.

State Rule Applicability - Individual Facilities

No changes in state applicability for any individual facility at this source have occurred due to this request.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

No compliance monitoring has changed due to this request.

Revisions made to FESOP:

The Table of Contents has been updated to reflect the changes made below.

D.1.1 VOC and HAP FESOP Limit [326 IAC 2-8-4] [326 IAC 12][40 CFR Part 60. 500, Subpart XX]

(a) The VOC emissions from the vapor recovery unit on the Loading Rack shall be limited to 35 milligrams per liter of gasoline (0.292 lbs per 1000 gals) outlet concentration.

(b) The amount of gasoline and distillate oil product loaded at the Loading Rack are limited to less than 400,000,000 gallons per 12 consecutive month period and 270,000,000 gallons per 12 consecutive month period respectively. These throughput limitations are equivalent to 82 tons of VOC per 12 consecutive month period from the loading rack and VRU~~, therefore, the requirements of 326 IAC 2-7 do not apply~~. **These throughput limits satisfy the requirement to restrict VOC and HAP emissions below the Major Source Thresholds as defined in 326 IAC 2-7-1 such that 326 IAC 2-7 (Part 70 Operating Permit Regulation) will not apply.**

~~(c) The amount of any single HAP emission from the vapor recovery unit on the Loading Rack shall be limited to less than nine and four tenths (9.4) tons per twelve (12) consecutive month period with compliance determined at the end of each month. The amount of any combination of HAPs emissions from the vapor recovery unit on the Loading Rack shall be less than twenty-three and five tenths (23.5) tons per twelve (12) consecutive month period with compliance determined at the end of each month. These limits are structured such that when including the emissions of the insignificant activities, the total source single HAP emissions remain below ten (10) tons per twelve (12) consecutive month period and the total source combination HAP emissions remain below twenty-five (25) tons per twelve (12) consecutive month period with compliance determined at the end of each month. Compliance with these limits renders the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.~~

D.1.6 VOC and HAPs

In order to comply with Conditions D.1.1, and D.1.~~3~~**4**, the carbon adsorber vapor recovery unit, for VOC and HAPs control shall be in operation and control emissions from the loading rack at all times gasoline is being loaded.

D.1.7 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

(a) To demonstrate compliance with Condition D.1.~~3~~**1(a)**, a compliance stack test shall be performed within a six (6) month period of issuance of this permit, and, thereafter, within five (5) years since the latest valid stack test of the carbon adsorber vapor recovery unit. This test shall be performed according to 40 CFR 60, Appendix A, Methods 25 and 25A.

(b) If the commissioner allows alternative test procedures in subsection (a)(1) or (c)(1)(B) of Condition D.1.~~3~~**4**, such method shall be submitted to the U.S. EPA as a SIP revision.

(c) During compliance tests conducted under 326 IAC 3-6 (stack testing), each vapor balance or control system shall be tested applying the standards described in subsection (c)(1)(B) of Condition D.1.~~3~~**4**. Testers shall use 40 CFR 60, Appendix A, Method 21 to determine if there are any leaks from the hatches and the flanges of the gasoline transports. If any leak is detected, the transport cannot be used for the capacity of the compliance test of the bulk gas terminal. The threshold for leaks shall be as follows:

(1) Five hundred (500) parts per million methane for all bulk gas terminals subject to NESHAP/MACT (40 CFR 63, Subpart R).

(2) Ten thousand (10,000) parts per million methane for all bulk gas terminals subject to a New Source Performance Standard.

~~D.1.8 Gasoline Transports [326 IAC 8-4-7]~~

~~Pursuant to 326 IAC 8-4-7, the permittee shall be responsible to insure that the Vapor Recovery Unit (V10) is connected to all transports and that the owners of all transports loading at the terminal~~

~~shall comply with this rule.~~

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.~~9~~**8** Carbon Adsorber

For the one (1) carbon adsorber, to document compliance with Condition D.1.~~3~~**4(c)**, the Permittee shall perform once per shift**,** whenever the processes being controlled are in operation, of the key operating parameters, including bed pressure and vacuum level, and document the findings. **The Permittee may use a portable thermal incinerator as a back up to the carbon adsorber. When a back up portable thermal incinerator is in use, the Permittee must perform a daily check of the thermal incinerator temperature.**

~~D. 1.10~~**9** Leak Inspection

Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. For purposes of this paragraph, detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.1~~1~~**0** Record Keeping Requirements

(a) To document compliance with Condition D.1.1**(b)**, the Permittee shall maintain **monthly** records at the source of the volume in gallons of each fuel received, including purchase orders and invoices necessary to verify the type and amount used;

(b) To document compliance with D.1.~~3~~**4(f)**, the owner or operator of a vapor balance or vapor control system subject to this section shall maintain records of all ~~certification~~ **compliance** testing. The records shall identify the following:
(1) The vapor balance, vapor collection, or vapor control system.
(2) The date of the test and, if applicable, retest.
(3) The results of the test and, if applicable, retest.

The records shall be maintained in a legible, readily available condition for at least two (2) years after the date the testing and, if applicable, retesting were completed.

(c) To document compliance with Condition D.1.~~3~~**4(a)**, the owner or operator of a gasoline transport subject to this section shall keep a legible copy of the transport's most recent valid annual modified 40 CFR 60, Appendix A, Method 27 test either in the cab of the transport or affixed to the transport trailer. The test record shall identify the following:
(1) The gasoline transport.
(2) The type and date of the test and, if applicable, date of retest.
(3) The test methods, test data, and results certified as true, accurate, and in compliance with this rule by the person who performs the test.

This copy shall be made available immediately upon request to the department and to the owner of the loading facility for inspection and review. The department shall be allowed to make copies of the test results.

~~(d) To document compliance with Condition D.1.4, the Permittee shall maintain records of the~~

~~following:~~

~~(1) Certification testing required under Condition D.1.4 (e), and~~

~~(2) Test required under Condition D.1.4 (f).~~

~~(e) To document compliance with Condition D.1.4 and Condition D.1.6, the Permittee shall maintain records at the facility of the materials used that contain any HAPs. The records shall be complete and sufficient to establish compliance with the HAP usage limits and/or HAP emission limits that may be established in this permit. The records shall contain a minimum of the following:~~

~~(1) The HAP/VOC ratio of each fuel received;~~

~~(2) The weight of HAPs emitted for each compliance period, considering capture and control efficiency, if applicable; and~~

~~(3) Identification of the facility or facilities associated with the usage of each HAP~~

(~~f~~**d**) To document compliance with Condition D.1.8, the Permittee shall maintain records of the following operation parameters of the carbon adsorber vapor recovery unit:
(1) bed pressure; and
(2) vacuum level.

(~~g~~**e**) To document compliance with Condition D.1.~~3~~**8**, the Permittee shall maintain records of the following operation parameters of the backup portable thermal incinerator when in use:
(1) dates when the portable terminal incinerator is in use; and
(2) a log of the daily check of the ~~alarm~~ **thermal incinerator temperature**, on those dates.

(~~h~~**f**) To document compliance with condition D.1.~~10~~**9**, the Permittee shall maintain records of each monthly leak inspection required under Sec. 60.502(j) shall be kept on file at the terminal for at least 2 years. Inspection records shall include, as a minimum, the following information: (1) Date of inspection. (2) Findings (may indicate no leaks discovered; or location, nature, and severity of each leak). (3) Leak determination method. (4) Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days). (5) Inspector name and signature.

~~(i) To document compliance with Condition D.1.3, the Permittee shall maintain records of the key operating parameters, including bed pressure and vacuum level, of the carbon adsorber.~~

D.1.1~~2~~**1** Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the ~~six (6) month~~ period being reported.

~~INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT~~
~~OFFICE OF AIR QUALITY~~
~~COMPLIANCE DATA SECTION~~
~~and~~
~~CITY OF INDIANAPOLIS~~

OFFICE of ENVIRONMENTAL SERVICES

FESOP Quarterly Report

Source Name: BP Oil Company
Source Address: 2500 North Tibbs Avenue, Indianapolis, Indiana 46222-0278
Mailing Address: P.O. Box 22278, Indianapolis, Indiana 46222
FESOP No.: F097-5563-00076

Facility: Source wide
Parameter: HAP Emissions
Limit: 25 tons of any combination of HAPs per twelve (12) consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE DATA SECTION
and
CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES

FESOP Quarterly Report

Source Name: BP Oil Company
Source Address: 2500 North Tibbs Avenue, Indianapolis, Indiana 46222-0278
Mailing Address: P.O. Box 22278, Indianapolis, Indiana 46222
FESOP No.: F097-5563-00076

Facility: ~~**Source wide**~~ **Loading Rack**
Parameter: ~~**HAP Emissions**~~ **Distillate Oil Througput**
Limit: ~~**10 tons of any single HAPs per twelve (12) consecutive month period**~~ **270,000,000 gallons per 12 consecutive month period**

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Conclusion

The operation of this gasoline distribution source shall be subject to the conditions of the attached proposed Significant FESOP Permit Revision No. SPR097-18167-00076.